

GENOVA BURNS LLC

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Local Counsel for the Plan Administrator

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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| In re: BLOCKFI INC., <i>et al.</i> , Debtors. ¹ | Chapter 11 Case No. 22-19361 (MBK) <i>Jointly Administered under a Confirmed Plan</i> ² |
| CAMERON WYATT, Appellant, v. BLOCKFI INC., <i>et al.</i> , Debtors-Appellees. | Civil Action No.: 3:23-cv-21306-ZNQ |

**NOTICE OF MOTION FOR AN ORDER
ADMITTING GEORGE W. HICKS, JR., ESQ. TO APPEAR *PRO HAC VICE***

TO: PARTIES ON THE COURT'S ELECTRONIC MAIL NOTICE LIST

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691.

² On October 3, 2023, the Court entered an order confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications). [Docket No. 1609]

PLEASE TAKE NOTICE that on a date to be determined by the Court, BlockFi, Inc., et al. (“Debtor-Appellees”) shall apply, pursuant to Local Civil Rule 101.1(c), before the Honorable Zahid N. Quraishi, United States District Court for the District of New Jersey, at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Room 5W, Trenton, NJ 08608, for entry of an Order admitting George W. Hicks, Jr., of the law firm Kirkland & Ellis LLP, counsel for Appellees in this proceeding, *Pro Hac Vice* on behalf of Appellees in the pending matter.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Appellees will rely upon the declarations of Donald W. Clarke and George W. Hicks, Jr. submitted herewith.

PLEASE TAKE FURTHER NOTICE that Appellees do not request the opportunity to present oral argument in support of this Motion.

PLEASE TAKE FURTHER NOTICE that a proposed order granting the relief requested is submitted herewith.

Dated: December 7, 2023

Respectfully submitted,

GENOVA BURNS LLC

By: /s/ Donald W. Clarke
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*Counsel for the Plan Administrator on behalf of
Debtor-Appellees*